

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

**JAMES SHELTON,**

Plaintiff,

v.

**QUAKE ENERGY LLC,**

Defendant.

Case No. 1:19-cv-01024-SO

Hon. Solomon Oliver, Jr.

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**PLAINTIFF'S MOTION TO ATTEND CASE  
MANAGEMENT CONFERENCE BY PHONE**

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James Shelton ("Plaintiff") respectfully requests that he be permitted to attend, by telephone, the Case Management Conference presently set for February 24, 2020. (See Doc. 11.)

Counsel for Plaintiff will be physically attending the Case Management Conference.

Plaintiff is located in King of Prussia, Pennsylvania and it will require significant time, expense, and resources for Plaintiff to travel to Cleveland, Ohio. The parties are in settlement negotiations/discussions and are very close to a possible resolution and Plaintiff being made to incur the additional costs associated with physically attending the Case Management Conference would likely add additional expenses that would result in difficulty in resolving the underlying dispute.

Therefore, Plaintiff respectfully moves that he be permitted to attend the February 24, 2020 Case Management Conference telephonically. A Proposed Order has been attached as Exhibit 1.

Respectfully submitted,

**REO LAW, LLC**

/s/ BRYAN ANTHONY REO

Bryan Anthony Reo (#0097470)

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*Attorney for James Shelton*

Dated: February 15, 2020

**CERTIFICATE OF SERVICE**

I, Bryan A. Reo, hereby certify that I am an attorney of record for a party to the above-captioned civil action, and on February 15, 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF System, which should then send an electronic notification of such filing to Attorney David M. Krueger at <dkrueger@beneschlaw.com> and Attorney Nora Cook at <ncook@beneschlaw.com>.

/s/ Bryan A. Reo  
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*Attorney for James Shelton*

Dated: February 15, 2020